

EXHIBIT 4

In the Matter Of:
Fair Fight vs Raffensperger

Jacqueline Bartley - Confidential

October 25, 2019



3200 COBB GALLERIA PARKWAY
SUITE 265
ATLANTA, GA 30339

1 daughter's situation, yeah.

2 Q. Now the experience that you reference in your
3 declaration is with regard to a primary election in
4 2018; is that correct?

5 A. Uh-huh (positive response). Yeah. Yes.

6 Q. Ms. Bartley, are you familiar with the -- the
7 lawsuit that your declaration is used in?

8 A. No, I am not.

9 Q. Okay. So -- well, were you aware before you
10 received the e-mail a week ago that your declaration
11 was being used in a lawsuit?

12 A. No.

13 Q. Okay. Do you currently know anything about
14 this lawsuit, other than what has happened --

15 A. Well --

16 Q. -- to you?

17 A. -- what I know is that I was someone who had
18 an issue and I was asked to tell my -- I was expected
19 to come here today and tell my story, what happened.

20 Q. Do you know who the parties are in this
21 litigation?

22 A. I do not know.

23 Q. Do you know what Fair Fight Action is?

24 A. I have heard of that organization or that
25 entity.